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*Attorneys for Defendants Vern Pierson;
Brittany Griffith; Jeff Dreher; Joseph Alexander;
Rich Horn*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MICHAEL C. STERNBERG

Case No. 2:23cv1466

Plaintiff

Dept. No.

SHELLEY WARNECK, et. al.

STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO
RESPOND TO COMPLAINT

Defendants.

Plaintiff MICHAEL C. STERNBERG and Defendants VERN PIERSON; BRITTANY GRIFFITH; JEFF DREHER; JOSEPH ALEXANDER; and RICH HORN (collectively, "the Parties") hereby stipulate as follows:

1. Plaintiff filed his Complaint on September 20, 2023 (ECF No. 1).

2. Defendants Pierson, Griffith, Dreher, Alexander, and Horn were served with

Plaintiff's Complaint on January 10, 2024.

3. On January 3, 2024, Defendant SHELLEY WARNECK, filed a Motion to Consolidate this case with the related case of *Sternberg v. Warneck*. Case No. 2:2-cv-01466-APG-EJY.

4. Plaintiff intends to file an amended complaint adding causes of action in addition to those asserted in the Complaint.

5. For the sake of efficiency and conservation of resources of both the Court and the Parties, the Parties stipulate to extend Defendants' Pierson, Griffith, Dreher, Alexander, and Horn deadline to file a responsive pleading or motion to dismiss until 21 days after both (1) Plaintiff has filed an Amended Complaint and (2) the Court has decided the Motion to Consolidate Cases.

6. The Parties preserve and do not waive any claims, objections, or defenses of any kind by entry of this Stipulation, and this Stipulation does not operate as an admission against interest by any Party.

WHEREFORE, the Parties pray that the Court approves the terms of this Stipulation.

DATED this 30th day of January, 2024.

McMENOMY LAW, PLLC

By: /s/ Michael C. Sternberg

Michael C. Sternberg
8545 W. Warm Springs Road
Ste A4 #256
Las Vegas, Nevada 89113
Plaintiff Pro Se

By: Jennifer McMenomy, Esq.
100 Vine Street
Reno, Nevada 89503
*Attorneys for Defendants Vern Pierson;
Brittany Griffith; Jeff Dreher; Joseph
Alexander; Rich Horn*

1 **[PROPOSED] ORDER**
2

3 IT IS SO ORDERED: Defendants Vern Pierson, Brittany Griffith, Jeff Dreher, Joseph
4 Alexander and Rich Horn are not required to file a responsive pleading or motion to dismiss until
5 21 days after (1) Plaintiff has filed an Amended Complaint and (2) the Court has decided the
6 Motion to Consolidate the Case.

7
8 **IT IS SO ORDERED:**
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10 
11 UNITED STATES MAGISTRATE JUDGE

12 DATED: January 31, 2024

13
14 Respectfully submitted:

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22
23 *Attorneys for Defendants Vern Pierson;
24 Brittany Griffith; Jeff Dreher; Joseph Alexander;
25 Rich Horn*

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